

CS 97-55

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Kate Plantholt
1207 Dulaney Woods Rd.
Cockeysville, MD 21030

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JUL 15 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Mr. Reed E. Hundt &
Federal Communications Commission:

I am a resident in Baltimore County, Maryland and have recently been researching the debates over the television rating system. I believe that the idea of including V-chips on all new televisions is very necessary with the rising violence in our country. However, I agree with the industry officials who state that the rating system for television shows is too broad. The rating system will give broad age guidelines, rather than specific information about levels of violence, horror, sex, and vulgar language.

I believe that the Federal Communications Commission should consider basing the television rating system on content. A U.S. News poll shows that 62 percent of parents prefer a content based system rather than age markers, and in a survey released by the Media Studies Center, 79 percent of parents also polled in favor of having a content based rating system. Television execs are afraid that the sex-and-violence labels could scare sponsors, and other critics believe that a content based rating system is too complex. I believe that having a producer decided whether a show is suited for seven year olds or fourteen year olds is far more complex. The rating responsibility should not be given to the people who produce and distribute shows.

Jack Valenti, the head of the Motion Picture Association of America, has responded to the concerns stating that he will not use any other television system

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rating guidelines. In response to this, I agree with Kathryn Montgomery, President of the Center for Media Education, who said, " I think the industry has gone out of its way to develop a rating system that will not tell parents whether there is violence in a program." Congress members were also criticizing the rating system during the February 27, 1997 hearing because it fails to indicate why the program is limited to a specific age range.

The current rating system has proved useless. The producers of , take for example Beevis and Butthead, can rate their television show T.V.-14 because they feel it is acceptable for fourteen year olds to watch, even though several acts of violence have been connected to the content of this program. If the Motion Picture Association of America desires to reduce violence on television with the new rating system, age markers will not do the job. A designation system that indicates the presence of sex, inappropriate language, or violence will be more useful. A content based system should at least be considered for a try.

Sincerely,

A handwritten signature in cursive script that reads "Kate Plantholt".

Kate Plantholt

JUN-20-1997 12:34 FROM PERRY HALL COPY

TO

12024182053

P.01

to Fax # 202-418-2053

CS97-85

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DOCKET FILE COPY ORIGINAL 20 June 97

JUL 15 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY


To: Judith Herman

Policy & Rules (202-418-2180)

From: Carl Elam

Home Phone: 410-529-9590

Attached is a letter for the Commissioners
related to V-Chip ratings. Please see
that it is received by the appropriate
persons.



4 sheets including cover.

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June 19, 1997

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To : Commissioners and Attendees of 20 June 97 Hearing on V-Chip Ratings

From: Maj. Carl M. Elam, USAF, Retired; Father of the V-Chip

Whenever I first conceived V-Chip in 1981-82, it was apparent that there would be problems in establishing the criteria for the rating scheme. It was, however, my opinion at that time, that public pressure and not politics would ultimately determine the suitability of the criteria. Regardless of what I thought at that time, the debate is raging and I feel obligated to give my point-of-view.

As I see it, the debate is primarily age based ratings vs. content ratings. Of course any one will concede that any age based scheme is founded upon some content based criteria so ultimately they are both actually content based. The real question is, should the viewer be allowed to independently select various content criteria levels?

To digress for a moment, it is easy to see that content based selection will create an uncertainty for sponsors of commercial TV. Why is that? Demographic studies can be made which will reveal trends that will allow advertisers to predict the statistics of how age-based rating selectors will be set, but no studies, short of direct inquiry via polling, can reveal how parents and viewers in general will set independently controlled content based selectors. The setting of content selectors will be a result of many complex factors in each persons culture and personal experience. These factors will sensitize or desensitize that person to the various content categories (sex, violence, language). To encourage or allow selection of what I shall call conflicting levels of content, does not make sense. By conflicting levels, I am referring to the option of selecting for example: a large degree of violence and a low lever of sexual content.

This sort of selection calls to mind society's behavior in the "sixties", a time in which the "flower children" so aptly stated, "Make love - not war." It wasn't until they actually said this out loud, that we (society at large) realized how ridiculous we actually were in promoting a destructive war (violence) and at the same time, in condemning the sexual behavior of young people (a natural human activity of procreation). But we were, of course, merely acting in response to our experience from WWII in which we were caught up in the necessary violence of war and at the same time in response to our religions teachings of sexual purity. If we take time to reflect on this inconsistency, we will see that our values are in conflict and are unnatural.

To further compound the problem we have casually reduced the categories of content to sex, violence and language. We must realize, however, that in today's world there are many other important issues which parents and viewers may wish to address. These range from specific religious views, political views, extreme cultural lifestyles, environmental abuse, animal abuse, child abuse, etc. Depending upon the person's background, any of these could be more important than sex, violence or language.

Based upon the foregoing, it seems to me that the only possible rating scheme is age based. It is necessary, of course, to establish agreed upon content categories (sex, violence, language, etc) and for each age group, include only appropriate materials from each category based upon an established criteria. Any scheme beyond this will, in time, make us look foolish and inconsistent. The most important task we have now is to establish a rating system with the attendant content categories and criteria, and carefully adhere to its criteria. In addition the public must be made constantly aware of the categories and criteria, and most importantly, a popular process (commission) must be established whereby the criteria and categories are carefully reviewed on a periodic basis.

Whenever I first conceived V-Chip in 1981-82 it was for the benefit of my children and for the children of all Americans. Our children are now grown and we are still waiting for V-Chip; I urge this body to diligently resolve your differences so the implementation can move forward.